

The FCC should consider the unique nature of Video Relay Services (VRS), due to the many limitations encountered by VRS Providers, rather than assuming functional equivalency can be achieved by following the traditional Telecommunications Relay Services (TRS) regulations. Various technological elements of VRS, as well as cultural-linguistic elements of American Sign Language(ASL) and the Deaf Community exist, which conflict with the legal expectations of VRS Communication Assistants (CA).

For example, TRS Rules as of 9/16/04, 47 C.F.R. § 64.604 (v) states: CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. (<http://www.fcc.gov/cgb/dro/4regs.html>)

While American Sign Language has a distinct grammatical and syntactical system and is defined as a true language, the use of ASL varies from region to region across the U.S. From simple sign variations to generational signing styles that differ, there is no one interpreter who will meet the definition of "qualified interpreter" for every conversation that takes place through VRS.

To demand that a VRS CA must remain on a call for no less than ten minutes does disservice to the relay users in the event that the interpreter is unfamiliar with a caller's style of language. In addition, not every interpreter has English vocabulary to effectively interpret every legal, technical, medical, or other conversation that involves professional jargon. Due to the inability to change interpreters until 10 minutes into the call, the interpreters can find themselves stammering and stuttering while trying to grasp the content and meaning of the message. This can cause frustration and confusion for both consumers, not to mention the probability of relaying inaccurate information. Stammering and stuttering, do not lend credence to the service or functional equivalence.

The Registry of Interpreters for the Deaf (RID) Code of Ethics, tenet number four states: Interpreters/translators shall accept assignments using discretion with regard to skill, setting, and the consumers involved.

Therefore, the TRS rule that a CA must remain on a call for at least ten minutes has potential of causing ethical dilemmas, misinterpretation, and confusion, rather than functional equivalency.

Interpreters should be given the discretion to transfer a caller or swap interpreters when they realize that communication is impeded. Callers should also be aware of their right to ask for a different interpreter at any moment during the call.

Finally, it would be much appreciated if the FCC acknowledged the interpreters who work in the VRS setting as professionals by removing the term CA as it previously applied to TDD operators, and assigning the title "Video Interpreter." Due to the nature of The FCC should consider the unique nature of Video Relay Services (VRS), due to the many limitations encountered by VRS Providers, rather than assuming functional equivalency can be achieved by following the traditional Telecommunications Relay Services (TRS) regulations. Various technological elements of VRS, as well as cultural-linguistic elements of American Sign Language(ASL) and the Deaf Community exist, which conflict with the legal expectations of VRS Communication Assistants (CA).

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Finally, it would be much appreciated if the FCC acknowledged the interpreters who work in the VRS setting as professionals by removing the term CA as it previously applied to TDD operators, and assigning the title "Video Interpreter." Due to the nature of VRS and its consumers, interpreters rarely find themselves doing anything other than interpreting or transliterating. Rather than reciting verbatim text on a screen, VRS interpreters capture the meaning of a message presented in one language and then must present it in another language. Therefore, the title "Communication Assistant" does not fully capture the role and function of the VRS interpreter.

\*\* TRS Rules as of 9/16/04 § 64.601 Definitions. (10) Qualified interpreter. An interpreter who is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.  
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